

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

NAVIENT SOLUTIONS, LLC

Plaintiff,

v.

THE LAW OFFICES OF JEFFREY  
LOHMAN, P.C., *et al.*,

Defendants.

CIVIL ACTION No. 1:19-cv-00461

**DECLARATION OF GEORGE R. CALHOUN**

1. I am member of Ifrah PLLC and attorney of record for Plaintiff Navient Solutions, LLC, (“NSL”) in the above-captioned matter. I have personal knowledge of the matters contained in this Declaration. If called, I could and would testify competently to the matters set forth herein.

2. I submit this declaration in support of NSL’s motion for partial summary judgment.

3. Documents attached as Exhibits 1 and 2 were produced by NSL in the underlying litigation and NSL’s witnesses could authenticate those documents if called at trial.

4. The remaining exhibits are: (i) documents produced by one or more of the Defendants and which I reviewed personally and which were reviewed by one or more Defendant at deposition and can be authenticated by them if called as a witness at trial, (ii) affidavits signed under oaths by witnesses prepared to testify at trial; (iii) deposition excerpts concerning matters as to which the deponent can and will testify at trial if called as a witness, or (iv) judicial records as to which the Court may take judicial notice.

5. I personally attended all of the depositions of parties in this case as to which a transcript excerpt is attached. Transcript excerpts from the underlying TCPA cases were produced

from NSL's ordinary course business records.

6. Attached as **Exhibit 1** is a true and correct copy of NSL's servicing agreement with Jamestown Funding Trust, which is Bates numbered NSL028206-41. This agreement is representative of NSL's servicing agreements.

7. Attached as **Exhibit 2** is a true and correct copy of NSL's trust agreement with Jamestown Funding Trust, which is Bates numbered NSL028242-50. This agreement is representative of NSL's trust agreements.

8. Attached as **Exhibit 3** is a true and correct copy of GST Factoring, Inc.'s Certificate of Incorporation, which is Bates numbered GST-002.

9. Attached as **Exhibit 4** is a true and correct copy of a transcript excerpt for the deposition of Rick Graff, taken May 11, 2020.

10. Attached as **Exhibit 5** is a true and correct copy of an email dated March 24, 2016, from Scott Freda to Gregory Trimarche and CCing numerous individuals, which is Bates numbered GST007640.

11. Attached as **Exhibit 6** is a true and correct copy of an email dated May 6, 2015, from Gregory Trimarche to Rick Graff and CCing Mike Miles and Amanda Johanson, which is Bates numbered GST-1173.

12. Attached as **Exhibit 7** is a true and correct copy of a transcript excerpt for the deposition of Gregory Trimarche, taken May 4, 2020.

13. Attached as **Exhibit 8** is a true and correct copy of an email dated May 5, 2015, from Gregory Trimarche to Mike Miles and CCing Rick Graff, which is Bates numbered GST-1163.

14. Attached as **Exhibit 9** is a true and correct copy of an email dated July 28, 2015,

from Gregory Trimarche to Amanda Johanson and Mike Miles and CCing Rick Graff, which is Bates numbered GST-1278-GST-1279.

15. Attached as **Exhibit 10** is a true and correct copy of an email dated April 29, 2015, from Mike Miles to Rick Graff, which is Bates numbered GST-1582.

16. Attached as **Exhibit 11** is a true and correct copy of an email dated May 1, 2015, from Mike Miles to Gregory Trimarche, Amanda Johanson, and Rick Graff, which is Bates numbered GST000465.

17. Attached as **Exhibit 12** is a true and correct copy of a document titled “Private Student Loan Script,” which is Bates numbered GST000495–96.

18. Attached as **Exhibit 13** is a true and correct copy of an email dated April 3, 2017, from Laci Norman to Anthony Sebreros and CCing Rick Graff and Scott Freda, which is Bates numbered GST000616.

19. Attached as **Exhibit 14** is a true and correct copy of a document titled “Private Student Loan Script,” which is Bates numbered GST000067.

20. Attached as **Exhibit 15** is a true and correct copy of a spreadsheet regarding Student Debt Freedom, which is Bates numbered GST-12779-80.

21. Attached as **Exhibit 16** is a true and correct copy of an email dated August 5, 2015 from Gregory Trimarche to David Mize and CCing Rick Graff, which is Bates numbered GST009232.

22. Attached as **Exhibit 17** is a true and correct copy of an email dated June 11, 2015 from Gregory Trimarche to Rick Graff, which is Bates numbered GST007555.

23. Attached as **Exhibit 18** is a true and correct copy of an email dated April 17, 2015, from Gregory Trimarch to Rick Graff and Amanda Johanson, which is Bates numbered

GST002200.

24. Attached as **Exhibit 19** is a true and correct copy of an attorney engagement agreement for the Johanson Law Group, which is Bates numbered GST002202.

25. Attached as **Exhibit 20** is a true and correct copy of an email dated January 21, 2016, from Gregory Trimache to David Mize and CCing Mike Miles and Rick Graff, which is Bates numbered GST007863.

26. Attached as **Exhibit 21** is a true and correct copy of an email dated October 23, 2015, from David Mize to Gregory Trimarche and Rick Graff, which is Bates numbered GST002934.

27. Attached as **Exhibit 22** is a true and correct copy of a cease and desist letter template for David Mize Law PLLC, which is Bates numbered NSL062078.

28. Attached as **Exhibit 23** is a true and correct copy of an email dated January 11, 2016, from David Mize to Gregory Trimarche, which is Bates numbered NSL062079.

29. Attached as **Exhibit 24** is a true and correct copy of an email dated January 6, 2016, from Gregory Trimarche to David Mize and Amanda Johanson and CCing Rick Graff and Mike Miles, which is Bates numbered GST010015.

30. Attached as **Exhibit 25** is a true and correct copy of a declaration and exhibits thereto made by David Mize and executed on November 27, 2019.

31. Attached as **Exhibit 26** is a true and correct copy of a transcript excerpt for the deposition of David Mize, taken on December 2, 2019.

32. Attached as **Exhibit 27** is a true and correct copy of a transcript excerpt for the deposition of Jacob Slaughter, taken on August 3, 2020.

33. Attached as **Exhibit 28** is a true and correct copy of an email dated February 25,

2017, from Buddy Sievers to Rick Graff, which is Bates numbered GST002632.

34. Attached as **Exhibit 29** is a true and correct copy of a report showing payments received by GST Factoring, Inc. between the years 2015 and 2019, which is Bates numbered GST-03310–11.

35. Attached as **Exhibit 30** is a true and correct copy of GST Factoring, Inc.’s referral agreement with Elsinore Lakes Inc. d/b/a Go2Finance, which is Bates numbered GST008247.

36. Attached as **Exhibit 31** is a true and correct copy of GST Factoring, Inc.’s referral agreements with DocuPrep Center, which are Bates numbered as GST000120 and GST002179.

37. Attached as **Exhibit 32** is a true and correct copy of GST Factoring, Inc.’s affiliate agreement with Student Loans of America, LLC, which is Bates numbered GST000323.

38. Attached as **Exhibit 33** is a true and correct copy of GST Factoring, Inc.’s affiliate agreement with Elsinore Lakes, Inc., which is Bates numbered GST000571.

39. Attached as **Exhibit 34** is a true and correct copy of GST Factoring, Inc.’s affiliate agreement with CMS, which is Bates numbered GST002351.

40. Attached as **Exhibit 35** is a true and correct copy of an email dated April 18, 2018, from Dave Abeling to Jeremy Branch, which is Bates numbered NSL039181–85.

41. Attached as **Exhibit 36** is a true and correct copy of GST Factoring, Inc.’s factoring agreement with David Mize, which is Bates numbered GST002196.

42. Attached as **Exhibit 37** is a true and correct copy of GST Factoring, Inc.’s factoring agreement with Jacob Slaughter, which is Bates numbered GST0010062.

43. Attached as **Exhibit 38** is a true and correct copy of a report showing payments made by GST Factoring, Inc., between the years 2015 and 2019, which is Bates numbered GST-03308–39.

44. Attached as **Exhibit 39** is a true and correct copy of an email dated March 9, 2017 from Jacob Slaughter to Rick Graff, which is Bates numbered GST007989.

45. Attached as **Exhibit 40** is a true and correct copy of an email dated March 9, 2017, from Gregory Trimarche to Jacob Slaughter and CCing Rick Graff, which is Bates numbered GST008126.

46. Attached as **Exhibit 41** is a true and correct copy of an email dated February 3, 2017, from Andrew Muehlbauer to Rick Graff and CCing Gregory Trimarche, which is Bates numbered GST007660.

47. Attached as **Exhibit 42** is a true and correct copy of an email dated April 24, 2015, from Mike Miles to Gregory Trimarche and Rick Graff, which is Bates numbered GST000418.

48. Attaches as **Exhibit 43** is a true and correct copy of an email dated January 26, 2018, from Rick Graff to Daniel Ruggiero, Zach Block, and Laci Norman and CCing Rick Graff, which is Bates numbered GST003543.

49. Attached as **Exhibit 44** is a true and correct copy of an Affiliate mailer, which is Bates numbered GST002557.

50. Attached as **Exhibit 45** is a true and correct copy of an Affiliate mailer, which is Bates numbered LOJL036946.

51. Attached as **Exhibit 46** is a true and correct copy of an Affiliate mailer, which is Bates numbered LOJL046370–71.

52. Attached as **Exhibit 47** is a true and correct copy of an email dated March 29, 2018, from E.A. to Alyson Dykes, which is Bates numbered LOJL022576.

53. Attached as **Exhibit 48** is a true and correct copy of an Affiliate mailer, which is Bates numbered LOJL103520.

54. Attached as **Exhibit 49** is a true and correct copy of an email dated August 25, 2015, from Gregory Trimarche to Rick Graff, which is Bates numbered GST002556.

55. Attached as **Exhibit 50** is a true and correct copy of an email dated March 21, 2016, from Mike Miles to Rick Graff, which is Bates numbered GST000595.

56. Attached as **Exhibit 51** is a true and correct copy of an email dated December 14, 2017, from Rick Graff to an Affiliate, which is Bates numbered GST00235.

57. Attached as **Exhibit 52** is a true and correct copy of an email dated July 27, 2017, from Scott Freda to RJ Marshall and CCing Rick Graff and Laci Norman, which is Bates numbered RM\_000302.

58. Attached as **Exhibit 53** is a true and correct copy of an email dated February 4, 2018, from Rick Graff to RJ Marshall, which is Bates numbered RM\_000760.

59. Attached as **Exhibit 54** is a true and correct copy of the Stipulated Final Judgment and Order as to Defendant Gregory Trimarche in *Bureau of Consumer Financial Protection v. GST Factoring, Inc., et al.*, Case No. 8:20-cv-01239 (C.D. Cal.), which is publicly available at [https://files.consumerfinance.gov/f/documents/cfpb\\_trimarche\\_stipulated-final-judgement-order\\_2020-07.pdf](https://files.consumerfinance.gov/f/documents/cfpb_trimarche_stipulated-final-judgement-order_2020-07.pdf).

60. Attached as **Exhibit 55** is a true and correct copy of stipulated Final Judgment and Order as to Defendant David Mize in *Bureau of Consumer Financial Protection v. GST Factoring, Inc., et al.*, Case No. 8:20-cv-01239 (C.D. Cal.), which is publicly available at [https://files.consumerfinance.gov/f/documents/cfpb\\_mize\\_stipulated-final-judgement-order\\_2020-07.pdf](https://files.consumerfinance.gov/f/documents/cfpb_mize_stipulated-final-judgement-order_2020-07.pdf).

61. Attached as **Exhibit 56** is a true and correct copy of GST Factoring, Inc.'s affiliate referral agreement with Globus Holding, which is Bates numbered GST000338.

62. Attached as **Exhibit 57** is a true and correct copy of GST Factoring, Inc.'s exclusive affiliate management agreement with Globus Holding, which is Bates numbered GST002678.

63. Attached as **Exhibit 58** is a true and correct copy of an email dated June 19, 2015, from Andrew Roosen to Mike Miles and CCing Bill Carlson and Rick Graff, which is Bates numbered GST008723.

64. Attached as **Exhibit 59** is a true and correct copy of an email dated November 7, 2017, from Laci Norman to Rick Graff and Scott Freda, which is Bates numbered GST010130.

65. Attached as **Exhibit 60** is a true and correct copy of a transcript excerpt for the deposition of Bill Carlson, taken June 17, 2010.

66. Attached as **Exhibit 61** is a true and correct copy of Bill Carlson's responses to NSL's interrogatories in the above-referenced matter.

67. Attached as **Exhibit 62** is a true and correct copy of an email dated June 10, 2015, from Bill Carlson to Rick Graff and CCing Ralph Demirtshian, which is Bates numbered GST007210.

68. Attached as **Exhibit 63** is a true and correct copy of GST Factoring, Inc.'s affiliate agreement with 4th Junction LLC, which is Bates numbered GST007211.

69. Attached as **Exhibit 64** is a true and correct copy of GST Factoring, Inc.'s affiliate agreement with Scisco, LLC, which is Bates numbered GST007212.

70. Attached as **Exhibit 65** is a true and correct copy of GST Factoring, Inc.'s affiliate agreement with Dappa, LLC, which is Bates numbered GST007213.

71. Attached as **Exhibit 66** is a true and correct copy of GST Factoring, Inc.'s affiliate agreement with SPC LLC, which is Bates numbered GST007214.

72. Attached as **Exhibit 67** is a true and correct copy of a transcript excerpt for the



deposition of Manny Kashto, taken June 3, 2020.

73. Attached as **Exhibit 68** is a true and correct copy of a declaration and the exhibits thereto made by David Sklar and executed on July 6, 2020.

74. Attached as **Exhibit 69** is a true and correct copy of an email dated May 8, 2015, from Mike Miles to Rick Graff and Scott Freda, which is Bates numbered GST000340.

75. Attached as **Exhibit 70** is a true and correct copy of a transcript excerpt for the deposition of RJ Marshall, taken June 3, 2020.

76. Attached as **Exhibit 71** is a true and correct copy of an email dated August 29, 2018, from Jacob Slaughter to Rick Graff, which is Bates numbered GST 0030000.

77. Attached as **Exhibit 72** is a true and correct copy of an email dated February 6, 2018, from Jacob Slaughter to Rick Graff, which is Bates numbered GST010018.

78. Attached as **Exhibit 73** is a true and correct copy of a transcript excerpt for the deposition of A.C., taken on August 18, 2017.

79. Attached as **Exhibit 74** is a true and correct copy of a transcript excerpt for the deposition of S.D., taken on August 11, 2017.

80. Attached as **Exhibit 75** is a true and correct copy of a transcript excerpt for the deposition of A.F., taken on March 3, 2018.

81. Attached as **Exhibit 76** is a true and correct copy of a transcript excerpt for the deposition of D.D., taken on August 28, 2018.

82. Attached as **Exhibit 77** is a true and correct copy of a transcript excerpt for the deposition of B.L., taken on May 9, 2018.

83. Attached as **Exhibit 78** is a true and correct copy of a document entitled “Compliance Call Script,” which is Bates numbered RM\_000301.

84. Attached as **Exhibit 79** is a true and correct copy of an email dated September 7, 2016, from Laci Norman to RJ Marshall and Mann Kashto and CCing Andrew Roosen and Scott Freda, which is Bates numbered GST002413.

85. Attached as **Exhibit 80** is a true and correct copy of an email dated June 7, 2016, from Mike Miles to RJ Marshall and CCing Manny Kashto and Rick Graff, which is Bates numbered GST007547.

86. Attached as **Exhibit 81** is a true and correct copy of a document entitled “FAQ,” which is Bates numbered LOJL102022–33.

87. Attached as **Exhibit 82** is a true and correct copy of of an email dated February 23, 2017, from Rick Graff to Bailey Reichelt and CCing Gregory Trimarche and Rick Graff, which is Bates numbered GST-1138.

88. Attached as **Exhibit 83** is a true and correct copy of an email dated January 5, 2018, from P.N. to Ibrahim Muhtaseb, which is Bates numbered LOJL085875–77.

89. Attached as **Exhibit 84** is a true and correct copy of an email dated September 28, 2016, from J.L. to Joel Knapp, Crystal Bleau, and Brittany Hernandez, which is Bates numbered LOJL023072.

90. Attached as **Exhibit 85** is a true and correct copy of a revocation script, which is Bates numbered LOJL122641.

91. Attached as **Exhibit 86** is a true and correct copy of an email dated February 26, 2016, from Jeffrey Lohman to David Mize, which is Bates numbered NSL055670.

92. Attached as **Exhibit 87** is a true and correct copy of an email dated March 15, 2016, from David Mize to Jeffrey Lohman, which is Bates numbered LOJL031057.

93. Attached as **Exhibit 88** is a true and correct copy of an email dated April 4, 2016,

from David Mize to Jeffrey Lohman, which is Bates numbered LOJL031062.

94. Attached as **Exhibit 89** is a true and correct copy of an email dated April 11, 2016, from David Mize to himself, which is Bates numbered NSL052113.

95. Attached as **Exhibit 90** is a true and correct copy of an email dated April 11, 2016, from Jeffrey Lohman to David Mize, which is Bates numbered NSL052117.

96. Attached as **Exhibit 91** is a true and correct copy of an email dated April 11, 2016, from Jeffrey Lohman to David Mize , which is Bates numbered NSL052116.

97. Attached as **Exhibit 92** is a true and correct copy of an email dated April 13, 2016, from David Mize to Jeffrey Lohman, which is Bates numbered NSL053898.

98. Attached as **Exhibit 93** is a true and correct copy of an email dated April 11, 2016, from Jeffrey Lohman to David Mize and CCing Dave Abeling, which is Bates numbered NSL052115.

99. Attached as **Exhibit 94** is a true and correct copy of an email dated April 25, 2016, from Lohman to David Mize, which is Bates numbered NSL054390.

100. Attached as **Exhibit 95** is a true and correct copy of a transcript excerpt for the deposition of Jeffrey Lohman, taken on June 1, 2020.

101. Attached as **Exhibit 96** is a true and correct copy of an email dated May 25, 2016, from David Mize to Melissa Jordan and Jeffrey Lohman, which is Bates numbered LOJL031309.

102. Attached as **Exhibit 97** is a true and correct copy of an email dated August 24, 2016, from Jeffrey Lohman to David Mize and CCing Melissa Jordan, which is Bates numbered NSL054346–47.

103. Attached as **Exhibit 98** is a true and correct copy of The Law Offices of Jeffrey Lohman, P.C.’s responses to NSL’s interrogatories in the above-referenced matter.

104. Attached as **Exhibit 99** is a true and correct copy of an email dated September 7, 2016, from Jeffrey Lohman to David Mize, which is Bates numbered LOJL032507.

105. Attached as **Exhibit 100** is a true and correct copy of a transcript excerpt for the deposition of Ibrahim Muhtaseb, taken May 29, 2020.

106. Attached as **Exhibit 101** is a true and correct copy of an email dated May 12, 2016, from Jeffrey Lohman to David Mize and CCing Brittany Hernandez, which is Bates numbered LOJL031150.

107. Attached as **Exhibit 102** is a true and correct copy of an email dated May 12, 2016, from Brittany Hernandez to Jeffrey Lohman and David Mize, which is Bates numbered LOJL031151.

108. Attached as **Exhibit 103** is a true and correct copy of an email dated April 25, 2017, from Ibrahim Muhtaseb to E.A., which is Bates numbered LOJL122445–47.

109. Attached as **Exhibit 104** is a true and correct copy of an email dated June 21, 2017, from Jeffrey Lohman to David Mize and Jacob Slaughter and CCing Jeremy Branch, Ibrahim Muhtaseb, and Kirstie Suarez, which is Bates numbered LOJL034996.

110. Attached as **Exhibit 105** is a true and correct copy of an email dated February 15, 2018, from E.A. to Alyson Dykes, which is Bates numbered LOJL111006–08.

111. Attached as **Exhibit 106** is a true and correct copy of an email dated May 5, 2016, from M.M. to Jeffrey Lohman, which is Bates numbered LOJL117500.

112. Attached as **Exhibit 107** is a true and correct copy of an email dated November 29, 2017, from Ibrahim Muhtaseb to J.L. and CCing David Mize, which is Bates numbered LOJL124023–25.

113. Attached as **Exhibit 108** is a true and correct copy of an email dated May 16, 2017, from Ibrahim Muhtaseb to M.C., which is Bates numbered LOJL122569.

114. Attached as **Exhibit 109** is a true and correct copy of an email dated June 7, 2017, from Ibrahim Muhtaseb to J.A., which is Bates numbered LOJL122127.

115. Attached as **Exhibit 110** is a true and correct copy of an email dated June 8, 2017, from Ibrahim Muhtaseb to S.S., which is Bates numbered LOJL121351.

116. Attached as **Exhibit 111** is a true and correct copy of an email dated June 20, 2017, from Ibrahim Muhtaseb to S.H., which is Bates numbered LOJL121908.

117. Attached as **Exhibit 112** is a true and correct copy of a transcript excerpt for the deposition of Alyson Dykes, taken June 2, 2020.

118. Attached as **Exhibit 113** is a true and correct copy of an email dated November 28, 2017, from Ibrahim Muhtaseb to J.L. and CCing David Mize, which is Bates numbered LOJL023123.

119. Attached as **Exhibit 114** is a true and correct copy of an email dated April 21, 2019, from D.I. to Jeremy Branch, which is Bates numbered LOJL104215–16.

120. Attached as **Exhibit 115** is a true and correct copy of an email dated July 13, 2017, from Jeremy Branch to a borrower, which is Bates numbered LOJL103660.

121. Attached as **Exhibit 116** is a true and correct copy of an email dated February 11, 2019, from Alyson Dykes to C.B. and CCing Jeremy Branch, which is Bates numbered LOJL020827.

122. Attached as **Exhibit 117** is a true and correct copy of a document entitled “[C.B.] v. Navient hearing date February 13, 2019 Direct Exam,” which is Bates numbered LOJL020829–33.

123. Attaches as **Exhibit 118** is a true and correct copy of an email dated February 12, 2019, from Alyson Dykes to C.B., which is Bates numbered LOJL020835.

124. Attached as **Exhibit 119** is a true and correct copy of a document entitled “[D.S.] v. Navient hearing date June 8, 2018,” which is Bates numbered LOJL021545–49.

125. Attached as **Exhibit 120** is a true and correct copy of an email dated June 7, 2018, from Alyson Dykes to D.S., which is Bates numbered LOJL021550.

126. Attached as **Exhibit 121** is a true and correct copy of “[D.S.] v. Navient hearing date June 8, 2018,” which is Bates numbered LOJL021551–56.

127. Attached as **Exhibit 122** is a true and correct copy of an email dated June 7, 2018, from Alyson Dykes to D.S., which is Bates numbered LOJL021557.

128. Attached as **Exhibit 123** is a true and correct copy of a document entitled “[A.S.] v. Navient hearing date June 21, 2018,” which is Bates numbered LOJL025334–39.

129. Attached as **Exhibit 124** is a true and correct copy of an email dated June 20, 2018, to Alyson Dykes to A.J., which is Bates numbered LOJL025340.

130. Attached as **Exhibit 125** is a true and correct copy of the document entitled “[C.B.] v Navient hearing date February 13, 2019 Direct Exam,” which is Bates numbered LOJL075841–47.

131. Attached as **Exhibit 126** is a true and correct copy of an email dated February 11, 2019, Alyson Dykes to Jeffrey Lohman and Jeremy Branch, which is Bates numbered LOJL075848.

132. Attached as **Exhibit 127** is a true and correct copy of a document entitled “[C.B.] v Navient hearing date February 13, 2019 Direct Exam,” which is Bates numbered LOJL075914–18.

133. Attached as **Exhibit 128** is a true and correct copy of a document entitled “[B.M.] v. Navient Solutions, LLC hearing date November 7, 2017,” which is Bates numbered

LOJL103616–19.

134. Attached as **Exhibit 129** is a true and correct copy of an email dated November 4, 2017, from Jeremy Branch to B.M., which is Bates numbered LOJL103620.

135. Attached as **Exhibit 130** is a true and correct copy of a document entitled “[B.M.] v. Navient Solutions hearing date September 8, 2017,” which is Bates numbered LOJL104660–61.

136. Attached as **Exhibit 131** is a true and correct copy of an email dated September 8, 2017, from Jeremy Branch to B.M., which is Bates numbered LOJL104662–66.

137. Attached as **Exhibit 132** is a true and correct copy of a document entitled “[L.W.] v Navient Solutions, LLC hearing date February 8, 2017,” which is Bates numbered LOJL106604–10.

138. Attached as **Exhibit 133** is a true and correct copy of an email dated February 7, 2018, from Alyson Dykes to L.W. and CCing Jeremy Branch, which is Bates numbered LOJL106611.

139. Attached as **Exhibit 134** is a true and correct copy of a document entitled “[B.M.] v Navient Solutions, LLC hearing date November 7, 2017,” which is Bates numbered LOJL106744–47.

140. Attached as **Exhibit 135** is a true and correct copy of an email dated November 6, 2017, from Jeremy Branch to B.M., which is Bates numbered LOJL106751.

141. Attached as **Exhibit 136** is a true and correct copy of an email dated November 21, 2017, from Ibrahim Muhtaseb to M.I., which is Bates numbered LOJL122182.

142. Attached as **Exhibit 137** is a true and correct copy of a document entitled “[M.I.] v. Navient Solutions, LLC hearing date November 20, 2017,” which is Bates numbered

LOJL122176–81.

143. Attached as **Exhibit 138** is a true and correct copy of a transcript excerpt for the deposition of D.S., taken in an underlying TCPA matter on October 30, 2017.

144. Attached as **Exhibit 139** is a true and correct copy of a transcript excerpt for the deposition of H.L., taken in an underlying TCPA matter on November 28, 2017.

145. Attached as **Exhibit 140** is a true and correct copy of a transcript excerpt for the deposition of L.L., taken in an underlying TCPA matter on December 8, 2017.

146. Attached as **Exhibit 141** is a true and correct copy of a transcript excerpt for the deposition of J.M., taken in an underlying TCPA matter on July 13, 2017.

147. Attached as **Exhibit 142** is a true and correct copy of a transcript excerpt for the deposition of B.M., taken in an underlying TCPA matter on June 16, 2017.

148. Attached as **Exhibit 143** is a true and correct copy of NSL's Revised Damages Chart, which identifies which attorney referred each relevant TCPA Case involving NSL, which attorney was assigned prosecute each case, and the disposition of each case. The chart accurately identifies the sums paid by that NSL claims it paid for settlements, damages, or as attorneys' fees. As demonstrated by this chart, NSL eventually forgave debt, entered settlements, or paid attorneys' fees totaling \$4,827,901.79.

149. Attached as **Exhibit 144** is a true and correct copy of a transcript excerpt for the deposition of Troy Standish, taken on June 12, 2020.

150. Attached as **Exhibit 145** is a true and correct copy of a transcript excerpt for the deposition of Wayne Travell, taken on August 3, 2010.

151. Attached as **Exhibit 146** is a true and correct copy of an email dated May 6, 2016, from Jeffrey Lohman to David Mize and CCing Brittany Hernandez, which is Bates numbered



LOJL031110.

152. Attached as **Exhibit 147** is true and correct copy of an email dated September 20, 2016, from Jeffrey Lohman to David Mize, which is Bates numbered NSL053759.

153. Attached as **Exhibit 148** is a true and correct copy of an email dated June 17, 2016, from David Mize to Brittany Hernandez, which is Bates numbered LOJL084997.

154. Attached as **Exhibit 149** is a true and correct copy of an email dated January 3, 2019, from A.M. to Carlos Alsina, which is Bates numbered LOJL103057–62.

155. Attached as **Exhibit 150** is a true and correct copy of an email dated March 28, 2018, from E.A. to Alyson Dykes, which is Bates numbered LOJL022541–42.

156. Attached as **Exhibit 151** is a true and correct copy of an email dated August 19, 2016, from Brittany Hernandez to M.C., which is Bates numbered LOJL115894.

157. Attached as **Exhibit 152** is a true and correct copy of an email dated July 5, 2016, from Brittany Hernandez to A.C., which is Bates numbered LOJL116476.

158. Attached as **Exhibit 153** is a true and correct copy of an email dated January 17, 2018, from Jeffrey Lohman to Daniel Ruggiero and CCing Zach Block, which is Bates numbered LOJL016430.

159. Attached as **Exhibit 154** are true and correct copies of various judicial records from *In re David Wayne Mize, Jr.*, Bar No. 03049 (Az. State Bar.), which are Bates numbered NSL016096–131.

160. Attached as **Exhibit 155** is a true and correct copy of a document entitled “Private Student Loan Script,” which is Bates numbered GST000132.

161. Attached as **Exhibit 156** is a true and correct copy of a transcript excerpt for the deposition of C.S., taken in an underlying TCPA matter on January 4, 2018.

162. Attached as **Exhibit 157** is a true and correct copy of a transcript excerpt for the deposition of E.A., taken in an underlying TCPA matter on February 26, 2018.

163. Attached as **Exhibit 158** is a true and correct copy of a transcript excerpt for the deposition of K.W., taken in an underlying TCPA matter on February 12, 2018.

164. Attached as **Exhibit 159** is a true and correct copy of a transcript excerpt for the deposition of K.K., taken in an underlying TCPA matter on May 14, 2019.

165. Attached as **Exhibit 160** is a true and correct copy of a chart showing borrower information, which is Bates numbered LOJL031058–61.

166. Attached as **Exhibit 161** is a true and correct copy of an email dated 2/3/17 from David Mize to Jeffrey Lohman and CCing Jeremy Branch and Ibrahim Muhtaseb, which is Bates numbered LOJL083708–09.

167. Attached as **Exhibit 162** is a true and correct copy of an email dated June 10, 2016, from Brittany Hernandez to David Mize, which is Bates numbered LOJL031461–63.

168. Attached as **Exhibit 163** is a true and correct copy of an email dated October 16, 2017, from Ibrahim Muhtaseb to David Mize and CCing Jeffrey Lohman, which is Bates numbered LOJL044857.

169. Attached as **Exhibit 164** is a true and correct copy of a transcript excerpt for the deposition of D.A., taken in an underlying TCPA matter on February 19, 2019.

170. Attached as **Exhibit 165** is a true and correct copy of a transcript excerpt for the deposition of Andrew Reinhart, taken on December 11, 2019.

171. This chart summarizes other admissible evidence contained in the documents produced by the parties, the Joint Statement of Facts and LOJL's privilege log.

<b>Borrower's Name</b>	<b>Date of Consent to Representation Email</b>	<b>Date of Arbitration Demand/Complaint Filing</b>	<b>Date of First Email from Attorney</b>
E.A.	9/20/2016	1/20/2017 (arbitration)	7/12/17
D.A.	9/28/2016	8/21/2017 (arbitration) 6/5/2018 (complaint)	12/4/2018
J.A.	8/31/2016	3/31/2017 (arbitration)	6/7/2017
J.B.	9/28/2016	10/31/2016 (arbitration)	3/1/2018
C.B.	6/2/2016	10/26/2016 (arbitration)	2/6/2018
K.B.	12/19/2017	7/30/2018 (arbitration)	8/3/2018
C.B.	5/25/2017	9/25/2017 (arbitration)	2/5/2018
D.C.	6/7/2016	10/17/2016 (arbitration)	N/A
A.C.	7/6/2016	1/24/2017 (arbitration)	6/13/2017
C.C.	1/12/2017	2/15/2017 (arbitration)	8/30/2017
C.D.	10/10/2017	7/27/18 (complaint) 7/18/19 (arbitration)	N/A
S.D.	10/21/2016	2/21/2017 (arbitration)	8/8/2017
A.F.	8/31/2017	9/20/2017 (arbitration)	9/22/2017
T.F.	7/29/2016	10/23/2016 (arbitration)	N/A
P.G.	7/27/2016	9/26/2017 (arbitration)	11/30/2017
B.G.	8/29/2016	1/24/2017 (arbitration)	5/24/2017
S.H.	10/26/2016	4/28/2017 (complaint)	6/20/2017
I.H.	12/21/2016	2/14/2017 (arbitration)	N/A
M.I.	10/17/2016	2/6/2017 (arbitration)	5/17/2017
E.I.	9/2/2016	1/20/2017 (arbitration)	N/A
D.I.	10/18/2017	1/23/2019 (arbitration)	4/18/2019
A.J.	8/30/2017	9/25/2017 (arbitration)	2/26/2018
C.J.	10/19/2016	4/7/2017 (complaint)	N/A
S.K.	8/16/2016	1/30/2017 (arbitration) 3/30/2017 (complaint)	2/13/2017
T.K.	9/29/2016	10/18/2018 (arbitration)	12/14/20
Y.K.	11/3/2016	1/27/2017 (arbitration) 4/6/2017 (complaint)	2/9/2017
K.K.	10/18/2017	7/31/2018 (complaint)	8/29/2018
H.L.	8/2/2016	1/5/2017 (arbitration) 6/13/2018 (complaint)	11/9/2017
L.L.	8/2/2016	10/26/2016 (arbitration)	11/24/2017
F.L.	10/31/2016	1/25/2017 (arbitration)	8/9/2017
B.M.	12/13/2016	1/23/2017 (arbitration)	7/12/2017
J.M.	10/25/2016	1/20/2017 (arbitration)	5/2/2017
B.M.	10/5/2016	1/23/2017 (arbitration)	4/6/2017
J.M.	9/29/2016	9/18/2017 (arbitration)	3/8/2018
M.M.	4/6/2017	9/25/2017 (arbitration)	4/6/2018
K.M.	5/25/2016	11/17/2016 (arbitration)	4/10/2017
T.N.	6/29/2017	9/25/2017 (arbitration)	2/19/2018

<b>Borrower's Name</b>	<b>Date of Consent to Representation Email</b>	<b>Date of Arbitration Demand/Complaint Filing</b>	<b>Date of First Email from Attorney</b>
J.P.	6/6/2016	10/12/2016 (arbitration)	10/3/2017
E.R.	N/A	1/19/2017 (arbitration) 5/17/2017 (demand amended)	5/17/2017
J.R.	N/A	1/31/2017 (arbitration)	N/A
W.R.	8/16/2016	1/27/2017 (arbitration)	11/2/2017
R.S.	5/26/2016	1/17/2016 (arbitration) 5/2/2018 (complaint)	1/23/2018
S.S.	11/11/2016	1/23/2017 (arbitration)	5/30/2017
V.S.	10/31/2016	1/20/2017 (arbitration)	8/29/2017
B.S. & M.S.	6/1/2016	10/31/2016 (arbitration) 8/28/2018 (demand amended)	11/15/2017
A.S.	9/26/2017	1/23/2019 (complaint) 8/5/2019 (arbitration)	6/22/2019
D.S.	9/15/2016	1/5/2017 (arbitration)	7/7/2017
J.T.	10/19/2016	2/15/2017 (arbitration)	N/A
C.T.	5/19/2016	1/26/2017 (arbitration)	N/A
L.W.	5/14/2016	11/17/2016 (arbitration)	1/19/2018
L.W.	8/23/2016	1/3/2017 (arbitration)	6/30/2017
K.W.	3/22/2017	7/1/2017 (arbitration)	12/27/2017
K.W.	9/20/2016	1/23/2017 (arbitration)	5/10/2017

I declare under penalty of perjury that the foregoing is true and correct.

DATED: October 20, 2020

Respectfully submitted,

/s/ George R. Calhoun, V

George R. Calhoun, V (*pro hac vice*)

*Counsel for Plaintiff Navient Solutions, LLC*